

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 State Bar No. 11479  
4 JOANNE L. DIAMOND  
5 Assistant Federal Public Defender  
6 411 E. Bonneville, Ste. 250  
7 Las Vegas, Nevada 89101  
(702) 388-6577  
Joanne\_Diamond@fd.org

8 Attorney for Jennifer Betancourt

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10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF NEVADA**

13  
14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 JENNIFER BETANCOURT,

18 Defendant.

19 Case No. 2:17-cr-00022-JCM-GWF

20 **STIPULATION TO CONTINUE**  
21 **REVOCATION HEARING**  
(First Request)

22  
23 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.  
24 Frierson, United States Attorney, and Kimberly M. Frayn, Assistant United States  
25 Attorney, counsel for the United States of America, and Rene L. Valladares,  
26 Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public  
Defender, counsel for Jennifer Betancourt, that the Revocation Hearing currently  
scheduled on May 24, 2023, be vacated and continued to a date and time convenient  
to the Court, but no sooner than thirty (30) days.

This Stipulation is entered into for the following reasons:

1. Defense counsel has a conflict on the currently scheduled Revocation  
Hearing date. She will also be out of the district May 29-June 2.

2. The defendant is out of custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

This is the first request for a continuance of the revocation hearing.

DATED: May 16, 2023.

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

By /s/ Joanne L. Diamond  
JOANNE L. DIAMOND  
Assistant Federal Public Defender

By /s/ Kimberly M. Frayn  
KIMBERLY M. FRAYN  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:17-cr-00022-JCM-GWF

Plaintiff,

## ORDER

V.

JENNIFER BETANCOURT,

Defendant.

10 IT IS THEREFORE ORDERED that the revocation hearing currently  
11 scheduled for Wednesday, May 24, 2023 at 11:00 a.m., be vacated and continued  
12 to June 28, 2023 at the hour of 10:30 a.m. ; or to a time and date convenient  
13 to the court.

DATED May 17, 2023.

James C. Mahan  
UNITED STATES DISTRICT JUDGE